

JACQUELYN S. LELEU, ESQ.  
Nevada State Bar No. 7675  
McDONALD CARANO WILSON LLP  
2300 W. Sahara Ave., Suite 1000  
Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
Facsimile: (702) 873-9966  
jleleu@mcdonaldcarano.com

ROBERT D. WICK, ESQ.  
(admitted *pro hac vice*)  
ANDREW SOUKUP, ESQ.  
(admitted *pro hac vice*)  
COVINGTON & BURLING LLP  
1201 Pennsylvania Avenue, NW  
Washington, DC 20004  
Telephone: (202) 662-6000  
Facsimile: (202) 662-6291  
rwick@cov.com  
asoukup@cov.com

*Attorneys for GE Money Bank*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

HAROLD GILES, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

GE MONEY BANK,

Defendant.

Case No.: 2:11-cv-00434-JCM-LRL

**DEFENDANT GE MONEY BANK'S  
UNOPPOSED MOTION REQUESTING  
EXTENSION OF TIME TO FILE REPLY  
BRIEF AND FOR LEAVE TO FILE  
REPLY BRIEF CONTAINING EXCESS  
PAGES  
(FIRST REQUEST)**

Defendant GE Money Bank ("GEMB") respectfully moves for an order (1) giving it two additional days, until September 9, 2011, to file a reply brief in further support of its arbitration motion, and (2) authorizing it to file a reply brief not to exceed 30 pages. In support of this unopposed motion, GEMB states as follows:

1. On June 16, 2011, this Court entered an order requiring GEMB to file its reply brief in further support of its motion to compel arbitration on September 7, 2011.

2. GEMB requests a short two-day extension to file its reply in this matter, making its reply due on September 9, 2011.

3. This is the first request for an extension GEMB has submitted related to this motion. The requested extension will not affect any other deadlines.

4. In addition, Local Rule 7-4 limits all reply memoranda to 20 pages, unless otherwise ordered by the Court.

5. Plaintiff's lengthy response included numerous small-print footnotes and raised a large number of arguments not addressed in GEMB's opening memorandum. In order to prepare a reply that is helpful to the Court and fully responsive to the issues raised in Plaintiff's response, GEMB requests leave to file a reply brief that does not exceed 30 pages. GEMB will endeavor to make the reply as short and concise as possible while still providing the Court with an appropriate discussion of the issues.

6. Plaintiff's counsel do not oppose either request.

7. This motion is made in the interests of justice and not to unduly delay these proceedings.

Wherefore GEMB respectfully requests that this Court grant its unopposed motion.

///

///

///

///

///

///

1 DATED this 31st day of August, 2011.

2  
3 McDONALD CARANO WILSON LLP

4 By: /s/ Jacquelyn S. Leleu  
JACQUELYN S. LELEU, ESQ.  
5 Nevada State Bar No. 7675  
2300 W. Sahara Ave., Suite 1000  
6 Las Vegas, Nevada 89102

7 ROBERT D. WICK, ESQ.  
8 (admitted *pro hac vice*)  
ANDREW SOUKUP, ESQ.  
9 (admitted *pro hac vice*)  
COVINGTON & BURLING LLP  
10 1201 Pennsylvania Avenue, NW  
11 Washington, DC 20004

12 *Attorneys for GE Money Bank*

13 IT IS SO ORDERED:

14  
15  C.W. Hoffman, Jr.  
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: September 2, 2011  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

McDONALD • CARANO • WILSON LLP  
2300 WEST SAHARA AVENUE, SUITE 1000 • LAS VEGAS, NEVADA  
PHONE (702) 873-4100 • FAX (702) 873-9966

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of McDonald Carano Wilson LLP, and that on this 31st day of August, 2011 I served a true and correct copy of DEFENDANT GE MONEY BANK'S UNOPPOSED MOTION REQUESTING EXTENSION OF TIME TO FILE REPLY BRIEF AND FOR LEAVE TO FILE REPLY BRIEF CONTAINING EXCESS PAGES via the U.S. District Court's Notice of Electronic Filing ("NEF") and/or first-class mail, postage prepaid in the above-captioned case, upon the following:

Richard Harris  
Kerry Earley  
RICHARD HARRIS LAW FIRM  
801 S. Fourth Street  
Las Vegas, NV 89101

Allen Carney  
Randall K. Pulliam  
CARNEY WILLIAMS BATES BOZEMAN  
& PULLIAM, PLLC  
1131 Arcade Drive, Suite 200  
Little Rock, Arkansas 72212

Wendy R. Fleishman  
Rachel Geman  
LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP  
250 Hudson Street, 8th Floor  
New York, NY 10013

Michael W. Sobol  
Allison Elgart  
LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111

Richard M. Golomb  
Ruben Honik  
Kenneth J. Grunfeld  
GOLOMB & HONIK, P.C.  
1515 Market Street, Suite 1100  
Philadelphia, PA 19102

*Counsel for Plaintiffs*

/s/ Katie Greenwell  
An Employee of McDonald Carano Wilson LLP